

## PRIVACY POLICY

### 1. General

We at iuro Rechtsanwälte GmbH (“PRIGHTER”) value your privacy and are committed to take care of your data, and we take this responsibility very seriously. Please take the time to carefully read our Privacy Policy, which explains why we collect your Personal Data and how we process it when you

- express an interest in our services (see, in particular, Section 3.1),
- are our client (see, in particular, Section 3.2 below)
- are our supplier or business partner (see, in particular, Section 3.3 below), or
- apply for a position with us (see, in particular, Section 3.4 below).

PRIGHTER also has a DPO, that

- (i) monitors the compliance of Processing with applicable standards,
- (ii) is a point of connection with the Data Subject for clarification of issues concerning the Processing of their information,
- (iii) collaborates with the supervisory authority,
- (iv) provides information and advises the Processor or subcontractor of its obligations regarding privacy and data protection.

<b>Controller</b>	iuro Rechtsanwälte GmbH (“PRIGHTER”) Schellinggasse 3/10 1010 Vienna Austria
<b>Data Protection Officer (DPO)</b>	DPO of iuro Rechtsanwälte GmbH Email: <a href="mailto:dpo@prighter.com">dpo@prighter.com</a>

### 2. Definitions

Unless otherwise indicated, capitalized terms used in this Privacy Policy are defined in Annex 1. Most of the definitions are derived from the General Data Protection Regulation (GDPR) which you can access from <https://eur-lex.europa.eu/eli/reg/2016/679/oj>.

### 3. How do we process your Personal Data?

We process your data in different ways depending on whether you visit our website or express an interest in our services, or whether you are our client, supplier, business partner or job applicant:

#### 3.1. Processing of Personal Data relating to potential clients

##### Purpose and legal basis

When you contact us to inquire about our service offering, we process the Personal Data you include in such a message, especially the contact form on our website, or included in the meta data of such



message to answer and process such inquiry in a precontractual stadium. Such processing is based on Art 6 para 1 lit (b) GDPR in order to take steps at your request prior to entering into a contract.

Furthermore, we process your Personal Data provided with an inquiry for direct marketing purposes to convert a potential client into an actual client. Such processing is based on a legitimate interest according to Art 6 para 1 lit (f) GDPR. You have the right, at all times, to object to the Processing of your Personal Data for the purpose of direct marketing, without being required to state your reasons, and can do so by sending us a letter or emailing us at [dpo@prighter.com](mailto:dpo@prighter.com). The Processing of your Personal Data for the purpose of direct marketing is not required in order to conduct our contractual relationship.

Upon your request we help you find a suitable partner in your region for privacy related services which we do not provide. According to such request we forward Personal Data to partners in the region where the client is looking for assistance.

### Personal Data processed

We mainly process the Personal Data you provide us with in a precontractual phase. For all data we collect from other sources please have a look at point 4.

We collect:

- Name
- E-mail address
- Employment
- Other Personal Data a Data Subjects includes in a free text field
- IP Address and IP location
- Referring (exit pages and URLs)
- Number, duration and time of visits (your interaction with the Website)
- Search engines, keyphrases and keywords used to find our site
- Browser type, type of device, screen size, internet service provider and operating system

### Recipients

To achieve the objectives described above, it may be necessary to disclose your Personal Data to the following Recipients in certain cases. Personal Data may be disclosed by being transferred, disseminated, or provided by other means to:

	Recipient	Data Location	Basis for transfer to third party country
1	SMAARC GmbH	EU	n/a
2	Partners such as law firms or privacy consultants	Region requested by the potential client.	Depending on the request of the potential client.

### Retention period

The Personal Data will be deleted 6 months after the lead is lost.



## Summary

Purpose	Legal Basis	Recipients	Retention
Answer inquiry	Contract Performance	1	7 years
Direct marketing	Legitimate interest	1	7 years
Referring partners	Contract Performance	2	7 years

## 3.2. Processing of Personal Data relating to clients:

### Purpose and legal basis

Your Personal Data as a client is processed, first and foremost, for the purpose of performing and providing our PRIGHTER Services. Such processing is based on the performance of a contract according to Art 6 para 1 lit (b) GDPR.

Besides that, we use your contact information to send you information on our services and invitations to events as a form of direct marketing. The processing activity is based on legitimate interest (Art 6 para. 1 lit (f) GDPR). You have the right, at all times, to object to the Processing of your Personal Data for the purpose of direct marketing, without being required to state your reasons, and can do so by sending us a letter or emailing us at [dpo@prigher.com](mailto:dpo@prigher.com). The Processing of your Personal Data for the purpose of direct marketing is not required in order to conduct our contractual relationship.

When working together with one of your partners or advisors upon your request we may share Personal Data with such partners.

### Processed Personal Data

We mainly process the Personal Data you provide us with. For all data we collect from other sources please have a look at point 4.

We collect:

- Name
- E-mail address and other contact details
- Employment
- Role and function in the company

### Recipients

To achieve the objectives described above, it may be necessary to disclose your Personal Data to the following Recipients in certain cases. Personal Data may be disclosed by being transferred, disseminated, or provided by other means to:

	Recipient	Data Location	Basis for transfer to third party country
1	SMAARC GmbH	EEA	n/a
2	Partners of the client	Region requested by the client.	Depending on the request of the client.



3	Stripe Payments Limited	Europe, EEA	n/a
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### Retention period

All Data necessary for tax purposes, especially contracts, invoices and other bookkeeping documents as well as relevant correspondence in relation to our contractual relationship we store for a period of ten years.

All other data we keep according to commercial law for a period of 7 years.

### Summary

Purpose	Legal Basis	Recipients	Retention
Contract	Contract Performance	1-3	7-10 years
Direct marketing	Legitimate interest	1-2	7 years
Client's partners	Contract Performance	2	7-10 years

## 3.3. Processing of Personal Data relating to suppliers and business partners

### Purpose and legal basis

Your Personal Data is processed, first and foremost, for the purpose of concluding, maintaining, and completing our contracts regarding PRIGHTER Services. We may refer clients to you or you may refer clients to us. We do so based on a cooperation agreement and the processing is based on the performance of such cooperation agreement (Art 6 para 1 lit (b) GDPR)

### Processed Personal Data

We mainly process the Personal Data you provide us with. For all data we collect from other sources please have a look at point 4.

We collect:

- Name
- E-mail address and other contact details
- Employment
- Role and function in the company
- Business activity

If your company details include a name of an individual, we may be required that you provide us with your Personal Data to enable us to enter into a business relationship with you.



## Recipients

To achieve these desired objectives, it may be necessary to disclose your Personal Data to the following Recipients in certain cases. Personal Data may be disclosed by being transferred, disseminated, or provided by other means to:

	Recipient	Registered Office (Country)	Basis for transfer to third party country
1	SMAARC GmbH	EEA	n/a
2	Stripe Payments Europe, Limited	EEA	n/a
3	Clients, suppliers and other business partners	Worldwide, depending on the registered office	explicit consent; necessary to perform a contract

## Retention period

All Data necessary for tax purposes, especially contracts, invoices and other bookkeeping documents as well as relevant correspondence in relation to our contractual relationship we store for a period of ten years.

All other data we keep according to commercial law for a period of 7 years.

## Summary

Purpose	Legal Basis	Recipients	Retention
Cooperation	Contract Performance	1-3	7-10 years

## 3.4. Processing of Personal Data relating to applicants:

### Purpose and legal basis

We process your Personal Data either

- to take steps prior to entering into a contract (conclusion of an employment agreement, Art. 6 para. 1 letter b GDPR),
- on the basis of your explicit consent (Art. 6 para. 1 letter a GDPR) if we would like to keep your application on file for future consideration,
- and to fulfil our legal obligations (registering you as an employee in the social security system, Art. 6 para. 1 letter c GDPR).

Your Personal Data are processed for the purpose of completing the application process and registering you with the social security system when we hire you. If you do not provide us with your Personal Data, we cannot process your application.



## Recipients

To achieve these desired objectives, it may be necessary to disclose your Personal Data to the following Recipients in certain cases. Data may be disclosed by being transferred, disseminated, or provided by other means.

	Recipient	Registered Office (Country)	Basis for transfer to third party country
1	SMAARC GmbH	EEA	n/a

## Retention period

The data of applicants who are not hired will be erased 6 months after the closure of the application. If the applicant consents to their data being kept on file for future consideration, we do not delete such Personal Data.

## Summary

Purpose	Legal Basis	Recipients	Retention
Application	Contract Performance	1	6 months

## 4. Collection of Personal Data from sources other than the Data Subject himself or herself (Art 14 GDPR)

### Purpose and legal basis

If we process your Personal Data we usually collect Personal Data from you, and it is usually you who provides us with this Personal Data. Nevertheless, in individual cases, we may also obtain Personal Data from other sources. These other sources are publicly available, such as information we obtain from the Internet. The information we obtain from third sources about you which is stored in our systems is limited to contact information (e-mail address and telephone number, postal address), your function in the company, your professional career, and your assignment to or responsibility for a particular company (usually your employer, any affiliated company or for another reason with this related company), if you have not disclosed that information to us as part of the communication. If you are an applicant, we can also process information about your school history, professional and academic career as well as about works written by you, from publicly available sources.

However, we usually ask you directly if you can provide us with this information if we could not find it in your application documents.

This Processing is based on our legitimate interest in a complete set of Personal Data required for professional communication, the Processing of our mandate, our business relationships and the application process, depending on the relationship we have with you (Art 6 para 1 (f) GDPR).



## 5. Data security

We handle Personal Data only as permitted by data protection regulations. We use a variety of technical and organizational measures to help protect your Personal Data from unauthorized access, disclosure, modification, loss or destruction in accordance with applicable data protection laws.

If we store or process Personal Data, it occurs in a high-security data center. In order to protect the security of your Personal Data during transfer, we use encryption techniques (e.g., SSL) over HTTPS. Our servers are secured by firewall and virus protection. Back-up and recovery procedures as well as roles and authorization policies are a given for us.

When handling Personal Data, our employees are obliged to comply with the regulations of the GDPR.

## 6. What are your rights with respect to Processing of Personal Data?

GDPR and other applicable data protection laws protect certain rights for Data Subjects. In particular:

**Right of Access** - right to obtain confirmation of which of your Personal Data is processed and information about it, for instance, which are the purposes of the Processing, what are the conservation periods, among others.

**Right of Rectification** - right to request modification of your Personal Data that is inaccurate or request incomplete Personal Data, such as the address, VAT, email, telephone contacts, or others.

**Right to Erasure or "right to be forgotten"** - right to erase your Personal Data, provided that there are no valid grounds for its retention, for example in cases where we have to keep the Personal Data to comply with legal obligation or because a court case is in progress.

**Right to Data Portability** - right to receive the Personal Data you have provided us in a digital format of current use and automatic reading or to request the direct transmission of your Personal Data to another entity that becomes the new responsible for your Personal Data, however only if technically possible.

**Right to Withdraw Consent or Right of Opposition** - right to object or withdraw consent at any time to Processing, for example in the case of Processing for marketing purposes, provided that no legitimate interests exist prevailing over your interests, rights and freedoms, such as defending a right in a judicial process.

**Right of Limitation** - right to request the limitation of the Processing of your Personal Data, in the form of: (i) suspension of Processing or (ii) limitation of the scope of Processing to certain categories of Personal Data or purposes of Processing.

**Right to object and automated individual decision-making** - When the Processing of Personal Data, including the Processing for the definition of profiles, is exclusively automatic (without human intervention) and may have effects in your legal sphere or significantly affect it, the Client shall have the right not to remain subject to any decision based on such automatic Processing, except as otherwise provided by law and shall have the right that we take appropriate measures to safeguard its rights and freedoms and legitimate interests, including the right to have human intervention in



decision making by us, the right to express its point of view or contest the decision taken on the basis of automated individual information Processing.

**Right to complain** - right to complain to the supervisory authority, in addition to us.

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive request, in which case a reasonable fee may be charged regarding its costs.

The information must be provided in writing but may be given orally if requested. In this case, we should verify your identity by means other than oral.

The response to requests should be provided within a maximum of 30 days, unless it is a particularly complex request.

#### **For Data Subjects in the EU:**

We value your data subject rights under GDPR and provide you with an easy way to submit us privacy related request like a request to access or erase your personal data. If you want to make use of your data subject rights, please visit: <https://prighter.com/q/16145647>

Contact Prighter

Prighter  
iuro Rechtsanwälte GmbH  
Attorneys at Law  
c/o PRIGHTER  
Schellinggasse 3/10, 1010 Vienna, Austria

Please add the following subject to all correspondence:  
Prighter ID: 16145647

## **7. Changes to our data protection provisions**

We reserve the right to modify this Privacy Policy, so it is always in compliance with the current legal requirements or to implement changes to services in the Privacy Policy, e.g., when introducing new services. In this case, your future visits to our website will be subject to the updated Privacy Policy. If you have additional questions regarding the processing of your Personal Data, please feel free to contact us directly, either by email at [dpo@prighter.com](mailto:dpo@prighter.com) or via mail to iuro Rechtsanwälte GmbH, Schellinggasse 3/10, A-1010 Vienna.





## Annex 1

<b>ADM</b>	Automated decision-making
<b>Consent of the Data Subject</b>	means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her;
<b>Controller</b>	means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data; where the purposes and means of such Processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law;
<b>Data Subject</b>	is any natural person whose Personal Data is being collected, held or processed. Examples of a Data Subject can be an individual, a customer, a prospect, an employee, a contact person, etc;
<b>Data Subject Request (DSR)</b>	means a formal request by a Data Subject to a Controller to take an action on his or her Personal Data;
<b>General Data Protection Regulation (GDPR)</b>	is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA); Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) <a href="https://eur-lex.europa.eu/eli/reg/2016/679/oj">https://eur-lex.europa.eu/eli/reg/2016/679/oj</a>
<b>iuro</b>	means iuro Rechtsanwälte GmbH, a company registered under FN 502860a with the companies register of the Vienna commercial court, 1010 Vienna, Austria.
<b>Personal Data</b>	means any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
<b>PRIGHTER Services</b>	Means the Data Privacy Request Management tool (PrighterDSR) and further tools as provided by iuro Rechtsanwälte GmbH under the trademark PRIGHTER.
<b>Processing</b>	means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
<b>Processor</b>	means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller;
<b>Recipient</b>	means a natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as Recipients; the Processing of those Personal Data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the Processing;



## Annex 2

### List of Sub-Processors

Our processors reported the following sub-processors:

	Sub-Processor	Registered Office (Country)	Basis for transfer to third party country
1	Strato	Data center within EEA	n/a
2	Hetzner Online	Data center within EEA	n/a
3	Salesforce, Inc.	USA	Standard contractual clauses
4	<a href="#">Stripe Sub-Processor list</a>	multiple	multiple